

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**RACHEL RAMSBOTTOM,  
ALEXIS BOWLING,  
JENNA HOUSTON,  
JANE DOE #1,  
Plaintiffs,**

**v.**

**LORIN ASHTON,  
AMORPHOUS MUSIC, INC.,  
BASSNECTAR TOURING, INC.,  
REDLIGHT MANAGEMENT, INC.,  
C3 PRESENTS, L.L.C.,  
INTERACTIVE GIVING FUND,  
GNARLOS INDUSTRIES, LLC,  
CARLOS DONOHUE, ABC  
CORPORATIONS, ONE THROUGH  
TEN (said Names Being Fictitious),  
JOHN DOES, ONE THROUGH TEN  
(said Names Being Fictitious),  
Defendants.**

**No. 3:21-cv-000272**

**Jury Trial Demanded**

**District Judge Aleta A. Trauger**

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**DECLARATION OF CARLOS DONOHUE IN SUPPORT OF HIS MOTION TO  
DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

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I, Carlos Donohue, state as follows:

1. I am a current resident of Portland, Oregon and have been a resident there during all years relevant to this litigation.
2. I have never lived in the state of Tennessee.
3. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration is executed on this the 30th day of August, 2021.

  
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Carlos Donohue